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November 27, 2023

**VIA ECF**

The Honorable Naomi Reice Buchwald, United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Olivet University v. Newsweek LLC et al.*, Case No. 1:23-cv-05670**

Dear Judge Buchwald:

We represent Plaintiff Olivet University (“Olivet”) in this action and write to submit the documents that the Court requested during the November 8, 2023 pre-motion conference. Specifically, the Court requested submission of (1) the indictment underlying Olivet’s defamation claim against Defendants, (2) Olivet’s plea agreement with the District Attorney of the County of New York, (3) Olivet’s plea allocution, and (4) the court order, if any, entering Olivet’s final, amended plea—which included a plea to a reduced charge, as contemplated by the plea agreement.

1. Attached as **Exhibit A** is a true and accurate copy of the indictment issued by the District Attorney of the County of New York, dated October 31, 2018.
2. Attached as **Exhibit B** is a true and accurate copy of the transcript that shows Olivet entering its initial plea, dated February 11, 2020.
3. Attached as **Exhibit C** is a true and accurate copy of Olivet’s plea agreement with the District Attorney of the County of New York, dated February 20, 2020.
4. Attached as **Exhibit D** is a true and accurate copy of the transcript of Olivet entering its final, amended plea, dated February 22, 2022.<sup>1</sup>

Respectfully submitted,

/s/ Philip M. Bowman  
Philip M. Bowman

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<sup>1</sup> The New York state court did not issue a written order regarding Olivet’s final plea. Rather, the court accepted Olivet’s final plea on the record and Exhibit D is the transcript of the relevant court proceeding.